

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS

ANANDA CAMARGO CHAVEZ,  
*Plaintiff,*

v.

REBUILT BROKERAGE LLC d/b/a  
REBUILT REALTY AND REBUILT  
OFFERS LLC  
*Defendant.*

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Case No. 1:24-cv-504-RP

**JOINT MOTION TO ENTER AGREED UPON PROTECTIVE ORDER**

COMES NOW, Plaintiff Ananda Camargo Chavez and Defendant Rebuilt Brokerage LLC d/b/a Rebuilt Realty And Rebuilt Offers LLC (collectively the “Parties”), by and through counsel and for their Joint Motion to Enter Agreed Upon Protective Order (“Protective Order”), state:

1. Federal Rule of Civil Procedure 26(c)(1) provides that “[a] party or any person from whom discovery is sought may move for a protective order in the court where the action is pending.” Fed. R. Civ. P. 26(c)(1). The motion must include a certification of conference showing that the movant conferred with the other parties in good faith in an attempt to resolve the matter without court involvement. *See id.* Here, the Parties move jointly for entry of a protective order.

2. Local Rules 26(c) states, “Protective Orders. Upon motion by any party demonstrating good cause, the court may enter a protective order in the form set out in Appendix H-1, or, in more complex cases, in Appendix H-2, or any other appropriate form. In cases where the parties agree to a protective order, the forms set out in Appendix H-1 and Appendix H-2 are approved.”

3. The Parties seek entry of this protective order to maintain certain information, including but not limited to personal information, confidential and proprietary information, and trade secrets, as classified and confidential throughout the course of this matter.

4. Pursuant to Local Rule CV-7(f), a proposed protective order is filed with this motion.

5. The proposed agreed upon Protective Order is attached to this Motion. This proposed Protective Order is in a form provided by the Western District of Texas, specifically the form as attached as Appendix H-1 to this Court's Local Rules.

WHEREFORE, the Parties respectfully request that this Court enter the attached Confidential and Protective Order, and to grant any other relief that this Court deems just and proper for all other relief entitled.

AGREED AS TO FORM AND CONTENT, AND RESPECTFULLY SUBMITTED:

**MARTIN GOLDEN LYONS**  
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